

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

**ILLINOIS COMMERCE COMMISSION
ON ITS OWN MOTION,**

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Docket No. 01-0539

**IMPLEMENTATION OF SECTION 13-712(g)
OF THE PUBLIC UTILITIES ACT,**

PUBLIC

**DIRECT TESTIMONY OF ROBERT R. JAKUBEK
DIRECTOR OF NETWORK OPERATIONS**

U. S. CELLULAR, INC.

JUNE 17, 2002

1 Q. Please state your name?

2 A. My name is Robert R. Jakubek.

3 Q. By whom are you employed and what is your title?

4 A. I am employed by U. S. Cellular, an Illinois wireless telecommunications provider. My
5 title is Director of Network Operations.

6 Q. How long have you worked for U. S. Cellular?

7 A. I have worked for U. S. Cellular since January 16, 1993.

8 Q. Please describe your educational background and provide specific details regarding any
9 education and/or training you have had that relates to telecommunications.

10 A. In 2001, I graduated from Colorado University, Colorado Springs, Colorado, with a
11 Master of Business Administration. I received a Bachelor of Science degree in Electronic
12 Management from Southern Illinois University, Carbondale, Illinois in 1996. In addition,
13 I have attended numerous vendor schools. I studied leadership, electronic theory and
14 application, communication security equipment, telephone central offices, and UHF,
15 VHF, HF and SHF radio systems at the Marine Corp Institute and other Marine Corp
16 educational facilities. I have taken numerous wireless communications courses offered
17 by Northern Telecom, Trilog, HT Communication, TEC and Harris Farinon. Those
18 courses covered SS7 Networking, Cellular Translations, Cellular Digital Packet Data,
19 System Performance and Optimization, Intermediate RF Engineering, Advanced Voice
20 Mail, Hand-off and Performance, Introduction to and Intermediate CDMA Engineering,
21 RF Model Optimization, RF Planning, Intermediate TDMA Engineering, Traffic
22 Planning and Engineering, and Digital Microwave.

23 Q. Please describe your telecommunications-related work experience before joining U. S.
24 Cellular.

25 A. During December 1989, I was a Switching Technician for the 7th Communication
26 Battalion. From December 1989 to December 1992, I was the manager of the
27 Communications Repair Group at Marine Control Group.

28 Q. Please describe your current duties and responsibilities as U. S. Cellular's Director of
29 Network Operations.

30 A. My duties and responsibilities are to monitor, manage and support the maintenance,
31 expansion, optimization and enhancements of U. S. Cellular's wireless communications
32 and data networks. As Director of Network Operations for the U. S. Cellular Great Lakes
33 Region, I manage seventy-two Network Operation associates, manage a \$6 million
34 capital budget and manage a \$14 million expense budget.

35 Q. Have you held any positions at U. S. Cellular other than Director of Network Operations?

36 A. Yes. When I joined U. S. Cellular in January 1993, I was a Network Field Engineer. In
37 February 1994, I became a Switch Engineer for the U. S. Cellular Midwest Region. In
38 December 1996, I became a Performance Engineer for the U. S. Cellular Midwest
39 Region. From January 1999 to February 2001, I was a regional Switch Manager for the
40 U. S. Cellular Midwest Region. I was promoted to Director of Network Operations in
41 February 2001.

42 Q. Please describe your duties and responsibilities as a Network Field Engineer for U. S.
43 Cellular.

44 A. As a Network Field Engineer, I was responsible for eight cell sites and one Northern
45 Telecom switch. I was responsible for construction, maintenance and optimization. I
46 installed and maintained RF and microwave equipment.

47 Q. Please describe your duties and responsibilities as a Switch Engineer for U. S. Cellular.

48 A. As a Switch Engineer, I was responsible for seven Northern Telecom switches in the
49 Midwest Region. I performed numerous switch cut-overs. I developed and implemented
50 U. S. Cellular's seven-to-ten digit conversion for Northern Wisconsin, maintained a
51 Motorola EMS-100 and helped deploy SS7 and integrate U.S. Cellular into the Northern
52 American Cellular Network ("NACN").

53 Q. Please describe your duties and responsibilities as a Performance Engineer for U. S.
54 Cellular.

55 A. As a Performance Engineer, I redesigned the wireless system to optimize customer
56 satisfaction. I designed and deployed U. S. Cellular's time division multiple access
57 ("TDMA") system for Des Moines, Iowa City, Davenport, Cedar Rapids, Waterloo and
58 Peoria.

59 Q. Please describe your duties and responsibilities as a Regional Switch Manager for U. S.
60 Cellular.

61 A. As a Regional Switch Manager, I managed seven network switch engineers and two PBX
62 technicians. I managed eight mobile telephone switching offices ("MTSO"), four PBXs
63 and numerous key systems. I served as the project leader for the Waterloo switch design,
64 installation and cut-over. I oversaw the budget for seven major switching facilities.
65 Finally, I successfully led the deployment of three GlenAyre voice mail ("VMX"), one

Trilog VMX, one area split, seven 10-digit translation conversions, seven translation clean-up projects, directory assistance call completion (“DACC”), cellular digital packet data (“CDPD”), one MTSO DC power conversion TDMA and numerous switch upgrades.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to describe U. S. Cellular’s performance experience with SBC/Ameritech (“Ameritech”) and Verizon as it relates to wholesale special access services in the part of Illinois served by U. S. Cellular’s Rockford switch and in Illinois RSA #1.

Q. Please summarize your testimony.

A. My testimony shows that the poor performance of wholesale special access circuits provided by Ameritech and Verizon has put U. S. Cellular at a competitive disadvantage.

Q. What percentage of the special access circuits that U. S. Cellular utilizes in the Illinois coverage areas for which you are responsible are provided by Ameritech and what percentage are provided by Verizon?

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92 Q. Please generally describe the quality of the wholesale special access services Ameritech
93 provided to U. S. Cellular between January 2000 and May 2002?

94 A. The quality of Ameritech's special access services during this period was and continues
95 to be poor. U. S. Cellular experienced many outages and long on-hold times when
96 calling Ameritech's service center. Moreover, Ameritech sometimes does not dispatch a
97 technician to fix a problem that required attention outside of usual business hours of
98 Monday through Friday, 8 a.m. to 5 p.m., leading to some extremely lengthy out-of-
99 service periods for U. S. Cellular.

100 Q. Please generally describe the quality of the wholesale special access services Verizon
101 provided to U. S. Cellular between January 2000 and May 2002?

102 A. Generally stated, Verizon's wholesale special access service is poor.

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105 Q. Does the poor quality of Ameritech's and Verizon's wholesale special access services
106 impact U. S. Cellular's network operations? If so, please explain how.

107 A. Yes. U. S. Cellular has had far too many outages. When a special access circuit fails, U.
108 S. Cellular cell sites go out of service or partially out of service. When this occurs, our

109 customers experience problems making and receiving telephone calls. In particular, they
110 may be unable to make any calls in the area of the downed cell site or the quality of calls
111 in that area is greatly impaired, including 9-1-1 calls. Frequent outages of special access
112 circuits cause customers to believe that wireless services are not as reliable as their land-
113 line telephones.

114 Q. What impact does the poor quality of Ameritech's and Verizon's wholesale special
115 access services have on U. S. Cellular's ability to compete in Illinois'
116 telecommunications market?

117 A. As noted above, frequent outages caused by the poor quality of Ameritech's and
118 Verizon's wholesale special access services cause customers to believe that wireless
119 services are not as reliable as their land-line telephones. Due to this perception, wireless
120 service providers are put at a competitive disadvantage. Customers rely on their land-line
121 telephones instead of wireless communications.

122 Q. Does Ameritech provide U. S. Cellular with reports regarding the performance of
123 Ameritech's wholesale special access circuits in the Illinois coverage area for which you
124 are responsible?

125 A. Yes. Ameritech recently began providing U. S. Cellular with reports regarding the
126 performance of its wholesale special access services during a calendar month. The report
127 generally consists of two parts, one part containing raw data and one part summarizing
128 that data. The first performance report Ameritech provided to U. S. Cellular covered
129 performance during March 2002.

130 Q. Is the information Ameritech includes in its monthly performance reports accurate?

131 A. No. Ameritech's monthly performance are inaccurate, slow to arrive and misleading.
132 For example, there were a number of problems with the March 2002 report. Specifically,
133 the summary part of the report did not match the part of the report containing raw data.
134 The summary mis-tagged fifteen trouble tickets as being caused by Customer Premise
135 Equipment ("CPE"). That designation meant that U. S. Cellular, rather than Ameritech,
136 was responsible for the problems. The raw data report showed no CPE.

137 Another more general problem with Ameritech's performance reports is that Ameritech
138 calculates its Mean Time to Repair ("MTTR") without including time Ameritech
139 designates as "NA" time. It is not clear to U. S. Cellular what "NA" time consists of.
140 Where Ameritech improperly excludes "NA" time from its MTTR statistics, the reported
141 statistics are skewed in Ameritech's favor. In other words, by improperly discounting
142 "NA" time from repair times, Ameritech reports misleading repair statistics that suggest
143 Ameritech is providing better service than it actually is.

144 Q. Is there a process by which discrepancies regarding the information included in
145 Ameritech's monthly performance reports is resolved?

146 A. Currently, there is no such process.

147 Q. Does Verizon provide U. S. Cellular with reports regarding the performance of Verizon's
148 wholesale special access circuits?

149 A. No.

150 Q. Now, I'd like to ask you some questions about the performance of the wholesale special
151 access circuits Ameritech provisioned for U. S. Cellular in the area of Illinois for which

you are responsible. Between January 2001 and May 2002, about how many failures occurred on Ameritech special access circuits?

Q. How much down time did U. S. Cellular experience as a result of those outages?

Q. What was the average amount of time it took Ameritech to repair the failures that gave rise to that hours of downtime?

Q. How much time did U. S. Cellular employees spend opening the trouble tickets necessary to get the failures repaired?

Q. Between January 1, 2001 and May 2002, in the area of Illinois for which you are responsible, about how many failures occurred on special access circuits provisioned by Verizon?

174 Q. How much down time did U. S. Cellular experience as a result of those outages?

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176 Q. What was the average amount of time it took Verizon to repair the

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180 Q. How much time did U. S. Cellular employees spend opening the trouble tickets necessary
181 to get the failures repaired?

182 A. I have not been made aware of any long hold time when calling into Verizon's service
183 center, so I would estimate fifteen minutes providing the information to the service center
184 and then any troubleshooting time required by my staff.

185 Q. Does this complete your direct testimony?

186 A. Yes.